

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Hearing Date: 01/22/10
Hearing Time: 10:00am

LYNN HOMES, INC.
dba JWL CONSTRUCTION CO.
dba JWL CONSTRUCTION CO., INC.,

Ch. 11
Case No. 08-23576-rdd

Debtor.

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S I R S :

PLEASE TAKE NOTICE that upon the annexed application of Elizabeth A. Haas, Esq., attorney for the Debtor, to be relieved as counsel, a motion will be made to the Hon. Robert D. Drain, U.S. Bankruptcy Judge, at the Courthouse located at 300 Quarropas Street, White Plains, New York 10601, on the 22nd day of January, 2010 at 10:00a.m., or as soon thereafter as counsel can be heard, for an Order relieving Elizabeth A. Haas as counsel for the Debtor, together with such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE, that objections filed by the parties with legal representation shall be filed (a)(i) through the Bankruptcy Court's electronic filing system (in accordance with General Order M-182) which may be accessed (with a password which is available by contacting the Bankruptcy Court's technical assistance at (914) 390-4060, Monday through Friday, 8:30 a.m. to 5:00 p.m.) through the Internet at the Bankruptcy Court's website: www.nysb.uscourts.gov, using Netscape Navigator software 3.0 or higher, and (ii) in portable document format (PDF) using Adobe Exchange software for conversion; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number of the

document to which the document refers, and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use the PDF format, such party shall submit the objection on diskette in either Word, WordPerfect or Dos text (ASCII) format.

An objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in this paragraph.

Dated: New City, New York
December 11, 2009

ELIZABETH A. HAAS, ESQ.
Attorneys for Debtor

/s/Elizabeth A. Haas
ELIZABETH A. HAAS, ESQ.
254 So. Main St., Suite 210
New City, N.Y. 10956-340
(845) 708-0340

TO: SEE ANNEXED

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TO: HON. ROBERT D. DRAIN, U.S.B.J.

APPLICATION TO WITHDRAW AS COUNSEL

The Application of Elizabeth A. Haas, as counsel for Lynn Homes, Inc. (the "Debtor") for an Order authorizing her withdrawal as counsel for the Debtor in the above-encaptioned proceeding, respectfully shows and represents:

1. On October 29, 2008, the Debtor filed a Chapter 11 petition in bankruptcy with this Court.
2. Concurrently with the filing of the petition in bankruptcy, an Order of Retention ("Retention Order") was prepared by counsel and discussed with the Debtor and executed by a principal of the Debtor prior to the submission to the Court. A copy of the Retention Order is annexed hereto as Exhibit "A".
3. The Chapter 11 proceeding was intended to permit the Debtor to save real estate owned by it and located in Pomona, New York or to sell the same to satisfy creditors' claims.
4. At the present time, however, the Debtor and your applicant cannot agree as to the proper course to effectuate this goal and have reached an irreconcilable dispute as to the direction of the case.

5. Prior to the filing of this motion, your applicant attempted to resolve these issues but was unsuccessful.

6. Your applicant is reluctant to include details regarding the issues between the Debtor and your applicant as to avoid any potential of attorney/client privilege.

WHEREFORE, Applicant prays for the entry of the annexed Order for which no previous application has been made.

Dated: New City, New York
December 11, 2009

/s/Elizabeth A. Haas
Elizabeth A. Haas, Esq.

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TO: HON. ROBERT D. DRAIN, U.S.B.J.

An application having been filed by Elizabeth A. Haas, Esq., counsel for Lynn Homes, Inc. (the "Debtor") for an order permitting Elizabeth A. Haas, Esq. to withdraw as counsel for the Debtors and a hearing having been held on January 22, 2010, at which time Elizabeth A. Haas, Esq., appeared and no opposition having been filed and no one appearing in opposition thereto and due deliberation having been had thereon it is

NOW on the motion of Elizabeth A. Haas, Esq. it is hereby

ORDERED that Elizabeth A. Haas be and she hereby is relieved as counsel for the Debtors; and it is further

ORDERED, that the Debtor shall obtain new counsel within thirty (30) days from the date of this Order.

Dated: White Plains, New York

_____, 2010

Hon. Robert D. Drain
U.S. Bankruptcy Judge
Southern District of New York